

COMMONWEALTH OF MASSACHUSETTS

ESSEX, ss.

SUPERIOR COURT DEPT.
CIVIL ACTION NO. 1877CV01022

[REDACTED]

Plaintiff,
v.
KEITH ABLOW, MD,

Defendant.

AFFIDAVIT OF [REDACTED]

I, [REDACTED] being duly sworn, declare under the pains and penalties of perjury, that the following is true and correct to the best of my knowledge and belief.

1. In the summer of 2015, I was 23 years-old and living in Minnesota when I reached out to Keith Ablow, MD regarding the use of Ketamine infusions to treat my longstanding depression.
2. Dr. Ablow told me he thought I was a candidate for Ketamine infusions and in July 2015, I traveled to Massachusetts to receive the infusions and also to receive psychotherapy with Dr. Ablow.
3. During the time I was in Massachusetts for my Ketamine infusions, Dr. Ablow would tell me he didn't want me to leave Newburyport because he would miss me. In one session I was telling him something important and he interrupted me to tell me how my eyes matched my shirt. He was flirting with me as his eyes went from my chest to my eyes.
4. When I returned to Minnesota, Dr. Ablow and I began to communicate between sessions via text messages and emails. Dr. Ablow asked that I text him a certain number of times per day and began scheduling sessions late in the evening. At the end of our first late night telephone session he told me "goodnight angel."
5. Soon after we started having sessions over the telephone, he would steer our conversations to sexual topics. For example, Dr. Ablow told me that he thought we were very connected. When I asked why he said it was because I wanted to be submissive and he wanted to be dominant. Then he asked me what my sexual fantasies were. During many if not most of our sessions Dr. Ablow would tell me how connected he felt we were and this would be followed by his asking me how I felt about him. When I indulged in these discussions, I would be rewarded with promises of free sessions or more frequent text messages and emails. In the beginning, when Dr. Ablow steered the discussion in the direction of personal

attraction between us I tried not to engage and told him I did not think we should go in this direction since I knew I would become too attached. He would agree and then a few minutes later he would return to the topic of “us”.

6. On or about August 21, 2015, Dr. Ablow texted me that he loved thinking about me when he was at work. It was the first time he used the word love. Later he told me he loved me over the telephone. In a future communication I told him I loved him.
7. During one of our earlier sessions, I told Dr. Ablow that I was a singer and songwriter. Dr. Ablow encouraged me to send him my music. I even wrote some songs about him. Dr. Ablow offered to introduce me to people to help me with my music career and told me about his company that helped people launch inventions and careers.
8. In October 2015, I went back to Massachusetts to meet with Dr. Ablow’s friend in the music business. I also scheduled an in person therapy sessions with Dr. Ablow while I was in town. I asked if our sessions could be outside of his office, and he agreed. I also suggested that I did not want them to be considered appointments and Dr. Ablow responded that it would be “tougher,” however over the telephone he agreed. It was not unusual for Dr. Ablow to say no to certain requests over texts messages and then tell me otherwise over the telephone.
9. On or about October 26, 2015, I had a 6:00 pm in person appointment with Dr. Ablow at his office. His secretary was not there. At the end of our session he kissed me on the cheek and we went into his office kitchen to return tea cups. We hugged and it became obvious to me that he had an erection. He made an exaggerated thrusting motion and then took my hand and placed it on his penis.
10. During one of the sessions in his office Dr. Ablow showed me a secret hiding place he had in his office by the window to the back yard in the wood paneling. He joked that he had hidden cocaine in there and told me that he had used cocaine eight times.
11. On several occasions during therapy he talked about guns. On one occasion he texted me a picture of a gun. During one of the sessions in the office he showed me a painting that he said had been given to him by a patient that was red and very dark and demonic and referenced words to the effect of “how could you do this to me, I trusted you”. He told me that this patient was crazy and that this was why he kept a gun in his desk.
12. On or about October 27, 2015, I met with the music producer that Dr. Ablow introduced me to. Later that evening, Dr. Ablow picked me up from the Airbnb that I was staying at and took me to dinner at Loretta in Newburyport. While we were in the car he brought up a picture I had sent him that showed a bruise on my arm. He told me that that was his sexual fantasy; that he wanted to do that to me. We ran into people he knew and he paid for our meal using a credit card. When I texted him to thank him for paying for dinner he told me that “thank yous” were unnecessary and that he wanted me to feel like I was around family when I was around him.
13. On or about October 28, 2015, I had another meeting with the music producer. Dr. Ablow and I had arranged to meet again that night, but he cancelled.

14. On or about October 29, 2015, Dr. Ablow suggested that we meet for coffee around 8:00 pm at Café Siena (now Commune Café) since he had to be home by 9:15 pm to help his son with homework. Dr. Ablow was late so I suggested we just sit outside. Dr. Ablow said he was not the sit outside kind of guy and we ended up meeting at his office. We went upstairs since his office is on the second floor and went into the portion of the office where he sees patients and has his desk. I recall his arm was in a sling. I was flying home the next day and when I told him I was taking a bus to the airport he was appalled and called the personal car service he used and told the company to put the charge on his bill. He had conversation on speaker and had the driver tell him the charge, which was \$160.00. After that Dr. Ablow told me he wanted to show me a painting in the office. As he was doing this he stood very close to me and brushed his hand across my hand in a way that felt very intimate. This was not the only time that he did this. He then led me into the adjoining room that has a fireplace and a couch and bookshelves. He told me he wanted to show me a painting in this room which he did. He also showed me a sculpture on the mantle of the fireplace of a man in a cage with his hands on bars and directly behind him there is a door to the cage that is open. He then led me to the couch. We had sexual intercourse on the couch. I remember that my mind concentrated on a ticking clock in the office to get through it. After this Dr. Ablow refused to look at me or talk to me that evening and told me that I needed to leave. I was very upset and frightened.
15. After leaving Dr. Ablow's office, I called and texted him. He immediately started responding differently and acted like he didn't know why I was upset.
16. When I returned home from my trip, Dr. Ablow continued to act differently towards me. Dr. Ablow would frequently cancel scheduled sessions claiming he forgot or something more important had come up. Despite asking me to send him text messages, he would often not respond making me feel abandoned, even more so than before. The phone call sessions were also different. On occasion Dr. Ablow would tell me I made it impossible for anyone to love me. At the end of each of the phone calls he would ask me to text him.
17. Throughout the time I spent treating with Dr. Ablow, he shared very personal details about his life such as his medical treatment including his shoulder surgery and talking about his children, including wanting me to meet them and sending photographs of his son [REDACTED]. He told me that he had not married the right woman; that he and his wife had been in couples counseling; that he had not waited long enough to find the right woman and if he had waited he would have found her. In context I felt he was talking about me. He told me his father was emotionally abusive and authoritative. He would also discuss other patients' medical treatment and talk about his secretaries including Jackie and Amy. He also suggested that I should work for him in his office, but told me his attorney wouldn't allow it. He told me it was a good thing I was not working for him because he would be constantly asking me for sexual favors.
18. On a few occasions Dr. Ablow brought up the subject of tattoos and asked me whether I would ever want a tattoo. I said no.
19. On or around November 28, 2015, I decided to end my therapeutic relationship with Dr. Ablow since I knew it was no longer healthy for me, but part of me felt very

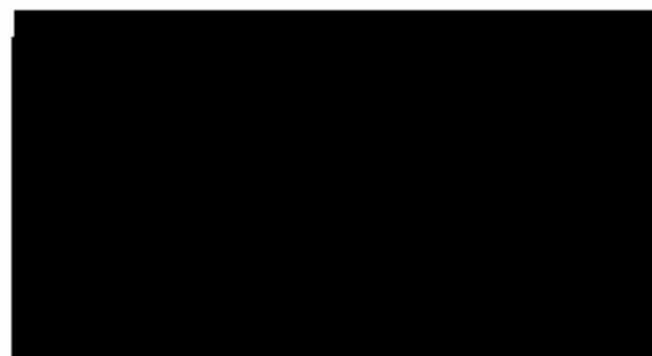
dependent on him and terminating felt terrifying. When I told Dr. Ablow that I thought we should terminate he suggested we schedule another session and work through our "issues".

20. On or around December 4, 2015, I received a text message from Dr. Ablow indicating that he thought it was better that I saw a clinician that was geographically closer to me. I was very upset since I was very dependent on Dr. Ablow. I understand now that this dependence was fostered by the way he "treated" me. Because I was upset and frightened, I pretended that I had recorded our telephone conversations and that I was going to tell my sister what had happened between us. He told me I had a personality disorder, which he never discussed before and told me I had done something illegal. Dr. Ablow also told me that the medical chart he kept on me would document my personality disorder and refusal to leave his office (which never in fact happened) and that I would not want anyone to see what he had written in it. Despite all of this, Dr. Ablow still tried to schedule another session with me.
21. On or about December 6, 2015, Dr. Ablow told me he was alerting his attorney and malpractice attorney.
22. Nevertheless, Dr. Ablow and I continued "therapy" until approximately March 2016.
23. Dr. Ablow continued to text and email with me. In one of these communications he included a picture of a tattoo on his upper arm. In September of 2016 Dr. Ablow sent me a form that he filled out himself entitled a "Notice of No Trespass" even though I had never "Trespassed" on his property. This was not issued by any court and there certainly was never any finding by any court that I had ever "Trespassed" on his property.
24. This Affidavit is not intended to be a comprehensive listing of all of the conduct or the many many communications by and with Dr. Ablow that have caused me great harm and for which I am in therapy, but rather it is a broad overview.

Signed under the pains and penalties of perjury:

Dated:

8/6/18

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